REMARKS

Status of the Claims

Claims 1-26 were presented for examination in this application, including independent claims 1 and 22. An Office action was issued on February 6, 2007, rejecting all pending claims under U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 7,006,453 to Ahmed et al. ("Ahmed"). In this response, Applicants have amended independent claims 1 and 22. No new matter has been introduced by these amendments, support therefor being found throughout the specification as originally filed. Applicants submit that the claim amendments recited above duly comply with the requirements of 37 C.F.R. 1.116 and respectfully request entry of these claim amendments.

Claim Amendments and Interview Summary

Applicants thank Examiner Ho for his time and courtesy extended during the telephonic interview on April 30, 2007, with the undersigned attorney, and for the helpful suggestions with respect to claim amendments. The following discussion is intended to constitute a proper recordation of this interview in accordance with MPEP §713.04, and also to provide a full response to the Office action.

Claim Rejections

Independent claims 1 and 22, as amended, recite predicting a future physical location of a destination node of a message and selecting intermediate nodes for relaying the message based on the predicted physical location. As a result, the claimed technique facilitates the routing of messages according to a future network topology (e.g., where a particular node will be) and directs messages accordingly, as opposed to using the network topology that existed at the time the message was initiated, which may be obsolete by the time the message traverses the network. See, for example, paragraph [0029] of the application as published.

Generally, Ahmed describes a geometry-based protocol for routing traffic from a source node to a destination node. (Ahmed, Abstract.) The Ahmed approach relies on a "distance-

based" method for determining a node to which packets outside the local topology are to be sent. (Ahmed, col. 2, lines 21-24.) As described, each node maintains a list of its neighboring nodes and the <u>current</u> distances to these nodes, and uses these distances in determining how to forward messages. (Ahmed, col. 5, lines 10-22.) The distance measurements, calculations, and propagation of these values are performed periodically (e.g., every second) to "continually update, or create its local topology." (Ahmed, col. 6, line 23-23).

In contrast, and as the undersigned noted during the interview, Applicants' claims recite using <u>predicted</u> locations of nodes as a basis for determining which intermediate nodes should be used to facilitate routing of a message through a network. Such an approach is clearly distinct from the conventional technique described by Ahmed in which <u>actual</u> distances among node locations are measured and used to make routing decisions. Whereas Applicants' invention <u>predicts</u> node locations (based for example on direction and/or speed of movement) Ahmed's approach relies on current locations – meaning that routing decisions are based on a destination location that may change by the time the message is received. As a result, in instances in which a destination node either moves or the location of the node is unknown, Ahmed's approach will either used outdated information or require an update of the network topology prior to transmission. Applicants' approach does not suffer from these shortcomings, as it is not limited to basing routing decisions on current locations of nodes or having to continually update the network topology. Thus, Applicants respectfully submit that independent claims 1 and 22 as amended, as well as those claims that depend therefrom, are patentable over the cited reference.
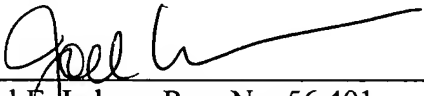
CONCLUSION

Applicants respectfully submit that, in light of the foregoing remarks, claims 1-26 are in condition for allowance, and request that application proceed to issue. If, in the Examiner's opinion, another telephonic interview would expedite the favorable prosecution of the present application, the undersigned attorney would welcome the opportunity to discuss any outstanding issues and to work with the Examiner toward placing the application in condition for allowance.

Respectfully submitted,

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